

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BRIAN CONWAY, individually and on
behalf of all similarly situated persons,

Plaintiff,

v.

MAPFRE U.S.A. CORP. and THE
COMMERCE INSURANCE COMPANY,

Defendants.

Civil Action No: 3:23-cv-12076-IT

**UNOPPOSED MOTION TO ADMIT COUNSEL
PRO HAC VICE (CARLYNNE A. WAGNER)**

Pursuant to Local Rule 83.5.3, the undersigned counsel, David Pastor, hereby moves the Court to enter an Order granting leave to Carlynne A. Wagner to appear on behalf of the plaintiff, Brian Conway, and practice before this Court in the above-entitled civil action.

As grounds for this motion, the undersigned represents the following:

1. Ms. Wagner has been a member in good standing of the bar of Pennsylvania since June 2022 as set forth in her accompanying Certification.
2. There are no disciplinary proceedings against Ms. Wagner as a member of the bar in any jurisdiction.
3. Ms. Wagner has represented to the undersigned counsel that she is familiar with the Local Rules of the United States District Court for the District of Massachusetts and that she agrees to comply with said rules.
4. Ms. Wagner has not previously had a *pro hac vice* admission to this Court (or other admission for a limited purpose under this rule) revoked for misconduct.

5. Ms. Wagner has submitted herewith her Certification for Admission *Pro Hac Vice* as required by Local Rule 83.5.3.

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(a)(2)

Undersigned counsel certifies that he has conferred with counsel for the defendants in a good faith effort to resolve or narrow the issues raised by this motion with the following result: counsel for the defendants indicated that the defendants do not oppose the relief sought by this motion.

Dated: September 19, 2023

Respectfully submitted,

PASTOR LAW OFFICE, PC

/s/ David Pastor

David Pastor (BBO # 391000)

63 Atlantic Avenue, 3d Floor

Boston, MA 02110

Telephone: (617) 742-9700

Facsimile: (617) 742-9701

Email: dpastor@pastorlawoffice.com

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on September 19, 2023.

/s/ David Pastor

David Pastor